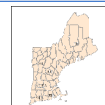


NESHAP 6H, HW rule change and Env-A 625 LPE

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June 13, 2014

Quick Overview



- National Emission Standards for Hazardous Air Pollutants HHHHHH (NESHAP6H) is a federal rule
 - NH does not have authority to enforce
 - New England states did NOT take delegation
 - NH does have authority to enforce
 - Hazardous waste
 - Regulated Toxic Air Pollutants
 - VOC RACT

NESHAP 6H Options

- Compliance deadline for existing auto body shops – January 2010
- Option 1 – Petition for Exemption from EPA Region 1
 - Certify coatings do NOT contain
 - Lead, chromium, cadmium, manganese, nickel
- Option 2 – Comply with NESHAP 6H

Comply with 6H



- Paint in "booth" (4 walls, roof, floor)
 - Ventilation
 - 98% capture efficiency exhaust booth filters
- Painter receives hands on training every 5 years
 - If used past experience the first time (2010) to comply with training requirement, you can't use it again.
- HVLP spray gun or equivalent
 - Don't spray solvent in air to clean spray guns
- Material Safety Data Sheets

Notification to EPA Region 1

- Send EPA Region 1 notification of compliance (2011)
 - If new shop must comply at start-up.
 - New painters trained within 180 days of hire
- Annual updates to EPA if needed
 - Due March 1



SBTAP Activities

- Since 2009, visited 375 auto body shops
 - Some multiple times
 - New owners
 - Complaints
 - Residents – painting outside
 - Competition
 - Employee referral
 - Town officials
- Guidance documents
 - Waste management
 - Air emissions
 - http://des.nh.gov/organization/commissioner/p2a_u/sbtas/sbtap/auto-body/index.htm



SBTAP Site Visit Follow-up

- Letters sent to shop
 - EPA Region 1
 - Air Compliance Enforcement
 - Compliance Assistance
 - Town code enforcement or planning
 - Local fire chief
 - DES programs
 - SQG Program
 - SRCIS (complaint investigation in Waste)
 - Air Compliance

New Hazardous Waste Rule on Thinner Recycler "Pucks"

- New guidance document
 - Review MSDS
 - F003 or F005 solvents
 - If only F003, can "test" to determine hazardous waste or solid waste.
 - If some F005, still hazardous waste. Don't bother testing.
 - Document results



New Hazardous Waste Rule on Thinner Recycler "Pucks"

- If F003 waste
 - Still notified as hazardous waste generator.
 - Continue to comply with SQG self-certification program every 3 years.
 - Continue to pay fees every 3 years.
 - No hazardous waste disposal fees.
- Don't rely on MA transporter or vendor. Different rules in MA.

Why Register with DES under Env-A 625 Limited Potential to Emit Registration?

- Shop goes on SBTAP visit list
 - Not air compliance section
 - Complaints referred
- "No permit required letter"
- "Blinder on" for past violations
 - RTAPs
 - VOCs
 - Not hazardous waste

How to Register Under Env-A 625



- Submit form to DES
 - Paper or online
 - <http://des.nh.gov/onestop/air-epermitting.htm>
- Certify
 - Annual VOC emissions under (3 tons)
 - Compliance with RTAPs
 - Maintain usage records (purchasing records)
 - Sign certification

Who Qualifies under Env-A 625?

- Surface coating operations – spray painting
- Material Usage Limits
 - Less than 3,000 gallons of solvent containing material
- OR
- Operating Limits
 - 2 or fewer bays devoted to painting
 - If painting entire vehicles, one bay devoted to painting
 - Physical or operational capacity to do no more than 21 jobs per week

Need help with Emission Calculations?

- Hire a consultant
 - NHADA members?
- Contact NHADA
 - SBTAP will train them
 - Excel spreadsheets
- Contact SBTAP
 - 603-271-1379
 - Sara.Johnson@des.nh.gov
- Emission calculations are required annually
 - Have on-site and provide when requested.

